



LAW OFFICES
LIMITED LIABILITY PARTNERSHIP

WILMINGTON, DE
LOS ANGELES, CA
SAN FRANCISCO, CA
NEW YORK, NY
HOUSTON, TX

919 NORTH MARKET STREET
17th FLOOR
P.O. BOX 8705
WILMINGTON
DELAWARE 19899-8705

TELEPHONE: 302.652.4100
FACSIMILE: 302.652.4400

LOS ANGELES
10100 SANTA MONICA BLVD.
13th FLOOR
LOS ANGELES
CALIFORNIA 90067-4003

TELEPHONE: 310.277.6910
FACSIMILE: 310.201.0760

SAN FRANCISCO
ONE MARKET PLAZA, SPEAR TOWER
40th FLOOR, SUITE 4000
SAN FRANCISCO
CALIFORNIA 94105-1020

TELEPHONE: 415.263.7000
FACSIMILE: 415.263.7010

NEW YORK
780 THIRD AVENUE
34th FLOOR
NEW YORK
NEW YORK 10017-2024

TELEPHONE: 212.561.7700
FACSIMILE: 212.561.7777

TEXAS
440 LOUISIANA STREET
SUITE 900
HOUSTON
TEXAS 77002-1062

TELEPHONE: 713.691.9385
FACSIMILE: 713.691.9407

Laura Davis Jones

April 7, 2022

302.778.6401
ljones@pszjlaw.com

The Honorable Craig T. Goldblatt
United States Bankruptcy Court
824 Market Street
Wilmington, Delaware 19801

Re: JAB Energy Solutions II, LLC (the “Debtor”)
Case No. 21-11226 (CTG)

Dear Judge Goldblatt:

The Debtor submits this letter to update Your Honor on the status of the above-captioned bankruptcy case following entry of this Court’s *Order Approving Debtor’s Settlement Agreement Regarding Decommissioning of High Island A370 Project* [D.I. 193] (the “Order”). At the Court’s suggestion, the Debtor filed its *Motion to Reopen Case Solely to Permit Filing of Motion to Modify Preliminary Injunction* (“Debtor’s Motion to Reopen”), along with the Debtor’s *Motion to Modify the Preliminary Injunction* (together, the Debtor Motions), in the proceeding in the District Court for the Eastern District of Louisiana (the “Louisiana District Court”).

Turnkey Offshore Project Services, LLC (“TOPS”) filed an opposition to the Debtor’s Motions and, separately, filed its *Motion to Reopen This Matter* (the “TOPS Motion to Reopen”) and *Motion to Maintain the Injunction as to the Black Elk Funds and to Confirm this Court’s Continuing Jurisdiction to Ultimately Decide All Aspects of the Matter Before It Notwithstanding TOPS Having Filed a Proof of Claim in the Bankruptcy Proceeding* (together, the “TOPS Motions”).

The Louisiana District Court scheduled an in-person hearing on the Debtor Motions and the TOPS Motions for Wednesday, April 13, 2022. The Debtor will provide a further update following the



The Honorable Craig T. Goldblatt
April 7, 2022
Page 2

Louisiana District Court's rulings on the Debtor Motions and the
TOPS Motions.

Counsel remain available at the Court's convenience if Your
Honor has any questions or issues in the interim.

Very truly yours,

/s/ Laura Davis Jones

Laura Davis Jones

cc: All parties by ECF